

29 January 2015

To the members of The Medical Board of Australia,

RE: Public Consultation, Guidelines - Supervised practice for international medical graduates

The Northern Territory Medicare Local (NTML) is pleased to have the opportunity to submit feedback to the Public Consultation on the draft revised Guidelines – Supervised practice for international medical graduates (IMGs).

As the Rural Workforce Agency for the Northern Territory, our organisation is closely involved with IMGs requiring supervision and with private practices and Aboriginal Community Controlled Health Services offering supervised placements for General Practitioners.

Our feedback is provided in the attached response.

The NTML looks forward to further information on the completion of the review of the guidelines for supervised practice.

Yours sincerely,

Nicki Herriot

Chief Executive Officer



January 2015

Public Consultation on the draft revised "Guidelines – Supervised practice for IMGs"

The Northern Territory Medicare Local (NTML) welcomes the opportunity to submit feedback to the proposed changes to the current Guidelines for Supervised Practice. As the Rural Workforce Agency for the Northern Territory, our organisation is closely involved with IMGs requiring supervision and with private practices and Aboriginal Community Controlled Health Services offering supervised placements for General Practitioners.

Feedback is provided in response to questions 1 and 3, in additional to general comments.

Response to questions:

1. Are the proposed restrictions on the number of IMGs a supervisor can supervise reasonable? (Maximum four IMGs – one level one IMG and up to three IMGs on other levels)

In principle the NTML supports the proposed supervision number restrictions and considers they do not introduce a major change in comparison to the current guidelines. The NTML is interested to receive further comments from AHPRA on the situations that will be considered as exceptional circumstances in which supervisors are allowed to supervise more than four IMGs.

3. Is it reasonable to require that if the position is in a general practice, the practice (not the position) must be accredited to the RACGP Standards for General Practice (4th edition)?

The NTML considers that it is reasonable that practices be accredited to the RACGP standards for General Practice and supports the requirement as a general measure for quality standards for practices. The NTML does note that there may be practices that employ IMGs requiring supervision that do not currently hold accreditation according to the RACGP standards. It would be important that this measure allows a transition period which will enable such practices to start and complete the accreditation process within a reasonable time frame.

General comments

The NTML welcomes the proposed new guidelines as clarification of several provisions in the current guidelines for supervised practice.

The NTML believes that it would be beneficial if AHPRA would provide more clarity on supervision levels available to IMGs who are applying for first registration as a medical practitioner in Australia. While realising that the decision of the initial supervision level is ultimately based on individual circumstances, it is often a crucial deciding factor in the recruitment process for the practice involved based on the availability of supervision especially in more remote areas. It would be of great value to the practices, the IMGs and the Rural Workforce Agencies to be able to estimate the initial level of supervision prior to commencing the recruitment process.